IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

| DON GIBSON, LAUREN CRISS, |) |
|--|-------------------------------------|
| JOHN MEINERS, and DANIEL UMPA, |) |
| individually and on behalf of all others |) Case No. 4:23-cv-00788 |
| similarly situated, |) [Consolidated with 4:23-cv-00945] |
| |) |
| Plaintiffs, |) Hon. Stephen R. Bough |
| v. |) |
| NATIONAL ASSOCIATION OF |) ORAL ARGUMENT REQUESTED |
| REALTORS, ET AL., |) |
| |) |
| Defendants. |) |
| |) |

<u>DEFENDANT WILLIAM RAVEIS REAL ESTATE, INC.'S MOTION TO COMPEL ARBITRATION AND/OR STAY PROCEEDINGS PENDING ARBITRATION PURSUANT TO SECTIONS 3 AND 4 OF THE FEDERAL ARBITRATION ACT</u>

Defendant William Raveis Real Estate, Inc. ("Raveis") respectfully moves this Court to compel any home seller who signed an arbitration or mediation agreement with Raveis or an affiliate of Raveis to arbitrate those claims and/or to stay this case pending arbitration by these putative class members pursuant to Federal Arbitration Act ("FAA"), 9 U.S.C. §§ 3, 4.

Accordingly, and for the reasons set forth more fully in Raveis' Suggestions in Support of this Motion, Raveis hereby moves this Court to stay this case as to Raveis and compel arbitration pursuant to FAA Sections 3 and 4.

Respectfully submitted,

Dated: January 17, 2025

By: /s/ Benjamin H. Diessel
Benjamin H. Diessel (pro hac vice)
John M. Doroghazi (pro hac vice)
Wiggin and Dana LLP
One Century Tower
P.O. Box 1832
New Haven, CT 06510
Tel: (203) 498-4400
bdiessel@wiggin.com

Christopher J. Kaufman (#62991 MO) SHOOK, HARDY & BACON L.L.P. 2555 Grand Boulevard Kansas City, Missouri 64108-2613 Telephone: (816) 474-6550

Facsimile: (816) 421-5547 ckaufman@shb.com

jdoroghazi@wiggin.com

Counsel for Defendant, William Raveis Real Estate, Inc.

CERTIFICATION

I hereby certify that on this 17th day of January 2025, a copy of the foregoing was electronically filed through the ECF system and will be sent electronically to all personal identified on the Notice of Electronic Filing.

> /s/ Benjamin H. Diessel Benjamin H. Diessel